

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RENEE ZINSKY,)	Civil Action No.: 2:22-cv-547
)	
Plaintiff,)	
)	
v.)	Electronically Filed
)	
MICHAEL RUSSIN, RUSSIN)	
FINANCIAL, RUSSIN GROUP,)	
SIMON ARIAS, III, ARIAS AGENCIES,)	
S.A. ARIAS HOLDINGS, LLC,)	
AMERICAN INCOME LIFE)	
INSURANCE COMPANY,)	
)	
Defendants.		

SECOND MOTION TO STAY PROCEEDINGS

AND NOW, comes Defendant, Michael Russin, by and through his attorneys Benjamin D. Webb, Esquire and Cozza Law Group PLLC, and files the within Second Motion to Stay the Proceedings, averring as follows:

1. Defendant, Michael Russin, and Plaintiff entered into mediation with David White of Burns White. Separately, Plaintiff entered into another mediation with Attorney White, with co-defendants, Simon Arias, American Income Life Insurance Company, et al. Due to ongoing settlement discussions, the parties filed a stipulated Amended Motion to Stay on October 26, 2023.
2. That Motion was granted, and the deadline for parties to file dispositive motions in this case was extended to January 21, 2024.
3. The parties now seek an additional stay to continue to work out the details of those ongoing settlement discussions.
4. For the aforementioned reasons, the undersigned counsel requests that the instant proceedings be stayed for an additional period of 90 days.

5. Counsel for Plaintiff, Renee Zinsky, has stipulated to this Motion.

WHEREFORE, Defendant, Michael Russin, respectfully requests that this Honorable Court enter the Order attached hereto, granting Defendant's Second Motion to Stay the Proceedings.

Dated: January 9, 2024

Respectfully submitted

Cozza Law Group PLLC

Savinis, Kane & Gallucci, LLC

s/Benjamin D. Webb
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing Motion to Stay has been sent via the CM/ECF system to all counsel and/or parties of record.

Cozza Law Group PLLC

/s/Benjamin D. Webb

Benjamin D. Webb, Esquire